

**OVERSEAS, INC.**

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May 16, 2006

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

***Re: WT Docket No. 01-309
HAC Digital Wireless Telephones***

Semi-Annual Report

Dear Ms. Dortch:

IT&E Overseas, Inc. ("IT&E"), is the licensee of Broadband PCS Stations KNLF923 (D-Block – Guam BTA), KNLG849 (D-Block – Northern Mariana Islands BTA), WPOK677 (C-Block – Guam BTA) and WPOK678 (C-Block – Northern Mariana Islands BTA). This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's *Report and Order* (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background, IT&E is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 *Order to Stay*, FCC 02-210, released July 26, 2002. Our wireless systems employ a CDMA air interface. We currently market fifty-one (51) digital CDMA wireless handset models. Of these handsets, five (5) have at least an M3 rating under ANSI Standard C63.19.

In September of last year, IT&E advised the Commission that it was in the process of supplementing its CDMA facilities with transmission facilities using the Global System for Mobile Communications ("GSM") air interface.¹ At the time, because we were unable to identify any hearing-aid compatible GSM phones, and because we could not be certain that compliant GSM phones would be available when our GSM service was launched, IT&E requested a temporary waiver of Rule Section 20.19 (c)(2)(i), out of an abundance of caution. Our GSM network has been turned up for initial testing but we are not yet offering GSM service to subscribers. We have also recently learned that there are at least seven (7) models of GSM handsets available that have achieved an M3 rating or better under ANSI Standard C63.19. These include the

¹ See IT&E Request for Temporary Waiver or Temporary Stay, WT Docket No. 01-309, filed September 16, 2005 ("Request for Temporary Waiver").

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LG L1400/1400i, the LG C2000, the Motorola V220, the Motorola V3, the Nokia 6102h, the Samsung P207 and the Samsung D307 (which has achieved an M4 rating). Accordingly, IT&E will make sure that it has a selection of these compliant GSM handsets available for customers prior to launching its GSM service, and it will formally withdraw its *Request for Temporary Waiver* in a separate filing once it has secured an adequate supply of such handsets.

To achieve compliance with the Hearing Aid Compatibility ("HAC") requirements of the R&O, IT&E is at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, we have no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, we must rely on the manufacturers to develop and test HAC-compliant digital wireless handsets for use on our system.

Given the foregoing, the information requested by the Commission is identified as follows:

Item 1 -- Digital Wireless Phones Tested: None. IT&E is a small carrier that is not involved in the handset development or testing process. The company will rely on testing performed by the handset manufacturers.

Item 2 -- Laboratory Used: None. See Response to Item 1.

Item 3 -- Test Results For Each Phone Tested: Not applicable. See Response to Item 1.

Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19: IT&E is currently marketing five (5) CDMA handsets that meet a M3 rating or better under ANSI Standard C63.19:

Kyocera	SoHo KX1
Kyocera	Slider Remix KX5
Motorola	Razr V3c
Motorola	V265
Motorola	V276

As noted above, IT&E's GSM network is not operational and the company is not currently offering GSM handsets for sale to subscribers.

Item 5 -- Report On The Status Of Product Labeling: IT&E is not involved in product labeling or the development of labeling standards. However, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. While the 2001 version of the C63.19 standard uses a "U" rating for radiofrequency (RF) immunity and a "UT" rating for acoustic coupling, the 2005 version uses labeling that is consistent with the switches on hearing aids (*i.e.*, specifying

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"M" for Microphone and "T" for T-Coil). Accordingly, all compliant handsets offered by the Filer will be labeled with the "M" and "T" ratings associated with the 2005 draft version of the ANSI technical standard, as appropriate.²

Item 6 -- Report On Outreach Efforts: IT&E has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate IT&E's employees and retail sales force about HAC-related issues and possible solutions.

Item 7 -- Information Related To Retail Availability of Compliant Phones: As noted above, IT&E currently has retail availability of five (5) CDMA handsets that meet a M3 rating or better under ANSI Standard C63.19:

Kyocera	SoHo KX1
Kyocera	Slider Remix KX5
Motorola	Razr V3c
Motorola	V265
Motorola	V276

Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones: The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order: None. IT&E is a small carrier that is not involved in standards development.

Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report: As noted above, IT&E currently offers fifty-one (51) different models of CDMA handsets. Upon information and belief, at least five (5) of these handsets meet a M3 rating or better under ANSI Standard C63.19.

Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices: None. IT&E is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

² See In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, *Order on Reconsideration and Further Notice of Proposed Rule Making*, 36 CR 190, 20 FCC Rcd 11221 at ¶¶ 33-36 (2005).

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Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast. Either may be reached by calling (202) 659-0830.

Respectfully submitted,

IT&E OVERSEAS, INC.

A handwritten signature in black ink, appearing to read 'John', with a long horizontal flourish extending to the right.

John M. Borlas, P.E.
President